

EXHIBIT D

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

QUILL INK BOOKS LIMITED,
Plaintiff,

v.

RACHELLE SOTO a/k/a Addison Cain,
Defendant.

No. 1:19cv476-LO-MSN

NOTICE OF 30(b)(1) DEPOSITION OF MS. ZOEY ELLIS

PLEASE TAKE NOTICE that commencing at 9:00 a.m. on June 10, 2020, at the offices of Craig C. Reilly, 111 Oronoco Street, Alexandria, Virginia 22314, Defendant Rachelle Soto a/k/a Addison Cain (“Cain”), by and through her counsel, will take the deposition upon oral examination of Ms. Zoey Ellis, a managing agent of Plaintiff, Quill Ink Books Limited, pursuant to Rule 30(b)(1) and Local Civil Rule 30(A). The testimony shall be recorded by stenographic means, and may be recorded by videographic means, before a Notary Public or officer authorized by law to administer such oaths and shall continue from day to day until completed.

Dated May 26, 2020

Respectfully Submitted,

/s/ Tynia A. Watson
Craig C. Reilly VSB # 20942
111 Oronoco Street
Alexandria, Virginia 22314
T: (703) 549-5354
F: (703) 549-5355
E: craig.reilly@ccreillylaw.com
Counsel for Defendant

Shawn M. Dellegar, OBA # 20973
Crowe & Dunlevy, P.C.
321 South Boston Avenue, Suite 500
Tulsa, Oklahoma 74103
T: (918) 592-9800
E: shawn.dellegar@crowedunlevy.com
Counsel for Defendant (Pro Hac Vice)

Tynia A. Watson, OBA # 30765
Crowe & Dunlevy, P.C.
324 N. Robinson Ave., Suite 100
Oklahoma City, Oklahoma 73102
T: (405) 235-7500
E: tynia.watson@crowedunlevy.com
Counsel for Defendant (Pro Hac Vice)

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2020, a true and correct copy of the foregoing has been mailed and emailed to the following:

Zuri Thompson
Quill Ink Books Limited
OFFICE 7
35-37 Ludgate Hill
London EC4M 7JN England
zoeytellis@gmail.com

/s/ Tynia A. Watson
Crowe & Dunlevy, P.C.
324 N. Robinson Ave., Suite 100
Oklahoma City, Oklahoma 73102
T: (405) 235-7500
E: tynia.watson@crowedunlevy.com

Counsel for Defendant (Pro Hac Vice)